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TRAPPE LANDING FARM & NATIVE SANCTUARY

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OCT 20 2010

Mr. Benjamin Grumbles
Chairman-EPA Gulf Task Force
1301 Constitution Ave. NW
Washington, DC 20460

Oct. 13 2010

EPA-Chesapeake Bay TMDL 10/12/10 Easton update

Dear Mr. Grumbles,

Trappe Landing Farm & Native Sanctuary is located at the headwaters of LaTrappe Creek in the Choptank watershed. Our location is important to our perspective. Due to the high farm acreage to Creek water volume we see every day the way the Chesapeake Bay water quality will look in the future. The future picture is very bleak with dramatic loss of water species in the last several years and noticeable increases in water turbidity. The Cove that bisects our property has had zero oxygen at the bottom two feet in the summer for 10 years. Other coves off the mainstem down to the mouth of the Creek are increasingly oxygen deficient and losing their ability to sustain species life in the summertime. We have not had underwater grasses which were prolific 40 years ago since 1980. After yesterday's meeting I am not encouraged about the future. The Choptank issues which are reflective of short cuts in soil management and overuse of farm chemicals nationwide are summed up in USGS circular 1228 page 6 which quantifies the affect of farm field fertilizer and farm animal manure at 59% and 35% of Delmarva nitrogen pollution. USDA SARE handbook #10 pg 118, Sustainable Soil Management, states the minimum sustainable crop rotation which is blatantly violated by every grain farmer in the Chesapeake Bay watershed but even more so in the Midwest where monocropping without cover crops is prevalent.

There are 4 actions that must be initiated now to begin to alleviate 60 years of unsustainable chemical farming and soil mismanagement. None of these are mentioned in Maryland's TMDL response. The first is the significant reduction in farm field fertilizer application rates, the second is the pyrolysis of farm animal manure, the third is a minimum 3 crop rotation plus mandatory winter cover crops and four is to end all corn subsidies including ethanol. For more than 35 years scientists have been increasingly aware that the American corn based diet is to blame for us being the world leader in major disease including cancer, heart disease, obesity, diabetes, alzheimer's, and the autoimmune diseases such as MS and

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Dedicated to the restoration of LaTrappe Creek

parkinsons (see the China Study post and the National Cancer Society report reference 16 on our website). We are also the world leader in farm animal cruelty as documented on our website.

At the EPA TMDL meeting in Easton yesterday your representatives advised that they had basically accepted Maryland's TMDL response. When asked about the recent disclosure by USGS that Choptank nitrogen pollution had increased 63% in the last 8 years your representative referred to a "small area above Greensboro". Creekwatchers reports for the last 15 years for our Creek and other streams in the Choptank South of Greensboro show that the entire Choptank is in decline at an increasing rate. In releasing the report the USGS scientist pointed out that the Choptank is indicative of all other Eastern Shore watersheds as shown in red on the EPA nutrient load maps where similar farming is practiced including the Sassafras, Chester, Nanticoke, and Pocomoke Rivers. What was not said was that Best Management Practices (BMPs) used extensively in the last 20 years have been ineffective in the view of the same USGS scientist who released the report. Maryland's TMDL response for agriculture is largely dependant on the voluntary implementation of the same BMPs that USGS questions. In short repeating the same actions despite failure after failure and expecting a different result is a definition of insanity.

You are Chairman of the Gulf Hypoxia 2008 Task Force, which reached the conclusion that 45% nutrient reduction is now needed versus the 20% recommended by the 2000 Task Force. As aquifers become more saturated with nitrogen and soils become more saturated with phosphorous nationwide the reduction need will accelerate exponentially. The US must start now with a minimum nationwide mandated 5% per year nutrient decrease for an unknown number of years and minimal criteria for soil management. American's are innovative and will most likely overcome the challenge of nutrient reduction with increased uptake efficiency for very inefficient corn but increased cost of animal protein and processed food and lower consumption would be a positive result for the nations health. In short there is no downside only upside in moving toward sustainable agriculture as recognized by a growing number of nutritionists, agronomists, and soil scientist. Many of these are identified in our website references.

Sincerely,

Don Kerstetter-President

Cc. Edwards-EPA
Koronski-EPA
Batiuk-EPA
Thorton-MDE
Rhoderick-MDA



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